Gillian Hines Kost (GK-2880) LONDON FISCHER LLP 59 Maiden Lane, 41<sup>st</sup> fl. New York, New York 10038 (212) 972-1000

Attorneys for Defendants: The Related Companies, L.P., Related Management Company, L.P., The Related Realty Group, Inc., Related BPC Associates, Inc., and Liberty View Associates, L.P.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER : 21 MC 102 (AKH)

MANHATTAN DISASTER SITE LITIGATION : THE RELATED

-----x: **DEFENDANTS'**WALTER GALLEGOS : **ADOPTION OF ANSWER TO**v. : **MASTER COMPLAINT** 

v. : THE RELATED COMPANIES, L.P., :

RELATED MANAGEMENT COMPANY, L.P., THE : 07 cv 4467 RELATED REALTY GROUP, INC., RELATED BPC :

ASSOCIATES, INC., LIBERTY VIEW ASSOCIATES,L.P:

PLEASE TAKE NOTE THAT Defendants, The Related Companies, L.P., Related Management Company, L.P., The Related Realty Group, Inc., Related BPC Associates, Inc., and Liberty View Associates, L.P., ("Related Defendants") by their attorneys, London Fischer, LLP, as and for their responses to the allegations set forth in the Complaint by Adoption (Check-off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopt The Related Defendants Answer to Master Complaint, dated August 3, 2007, which was filed in the matter of In re World Trade Center lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, the Related Defendants demand judgment dismissing the abovecaptioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York September 13, 2007

LONDON FISCHER LLP

By: Gillian Hines Kost (GK-2880)

59 Maiden Lane

New York, New York 10038

(212) 972-1000

Attorneys for Defendants:

The Related Companies, L.P.,

Related Management Company, L.P., The Related Realty Group, Inc., Related BPC Associates, Inc.,

Page 2 of 5

and Liberty View Associates, L.P.

TO:

Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, New York 10604

Robert J. Higgins Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street N.W. Washington, DC 20037

Lionshead 110 Development, LLC Eschen, Frenkle & Weisman, LLP 20 West Main Street Bayshore, NY 11706

Liaison Counsel for Plaintiffs

Christopher Lopalo, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> floor New York, New York 10006 Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> fl. New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> floor New York, New York 10279

## Liaison Counsel for the Defendants

Joseph Hopkins, Esq. Patton Boggs LLP 1 Riverfront Plaza, 6<sup>th</sup> fl. Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

K:\VGFutterman\WTC-Related\Pleadings\NoticeofAdoption-Gallegos.doc

## **CERTIFICATE OF SERVICE**

I hereby certify that I caused a true copy of The Related Defendants' Notice of Adoption of Answer to Master Complaint was served via First Class Mail on the day of September 17, 2007, upon the following:

Battery Park City Authority c/o Wilson Elser, et al. 3 Gannett Drive White Plains, NY 10604

Robert J. Higgins Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street N.W. Washington, DC 20037

Lionshead 110 Development, LLC Eschen, Frenkle & Weisman, LLP 20 West Main Street Bayshore, NY 11706

## Liaison Counsel for Plaintiffs

Christopher Lopalo, Esq. Worby Groner Edelman & Napoli Bern LLP 115 Broadway, 12<sup>th</sup> floor New York, New York 10006

Robert A. Grochow, Esq. Robert A. Grochow, P.C. 233 Broadway, 5<sup>th</sup> fl. New York, New York 10279

Gregory J. Cannata, Esq. Law Offices of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> floor New York, New York 10279

## Liaison Counsel for Defendants

Joseph Hopkins, Esq.
Patton Boggs LLP
1 Riverfront Plaza, 6<sup>th</sup> fl.
Newark, New Jersey 07102

Thomas Egan, Esq. Flemming Zulack Williamson Zauderer LLP One Liberty Plaza New York, New York 10006

The undersigned further certifies that on September 17, 2007, I caused the Notice of Adoption of Answer to Master Complaint to be electronically served via the Court's ECF System.

Dated: September 17, 2007

Gillian Hines Kost